

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA : CRIMINAL NO. 19-
v. : DATE FILED:
LOREN VARGA : VIOLATIONS:
 : 16 U.S.C. §§ 1538(a)(1)(E) and 1540(b)(1)
 : (Endangered Species Act – 1 count)
 : 16 U.S.C. §§ 3372(a)(1) and 3373(a)(1)(B)
 : (Lacey Act trafficking – 1 count)

INFORMATION

COUNT ONE

(Endangered Species Act Violation)

THE UNITED STATES ATTORNEY CHARGES THAT:

1. At all times relevant to the indictment, defendant LAREN VARGA was a resident of Franklin Park, New Jersey.
2. The Endangered Species Act (“ESA”), Title 16, United States Code, Sections 1531 et seq., was enacted to provide a program for the conservation of endangered and threatened species. The term “endangered species” means any species, or part thereof, which is in danger of extinction throughout all or a significant portion of its range. Title 16, United States Code, Section 1532(6). All species determined to be endangered under the ESA are listed in Title 50, Code of Federal Regulations, Section 17.11. Tiger, (*Panthera tigris*), is listed as an endangered species pursuant to the ESA.
3. The term “fish or wildlife” means any member of the animal kingdom, including without limitation any mammal, fish, bird, amphibian, reptile, mollusk, crustacean, arthropod, or

other invertebrate, and includes any part, product, egg, or offspring thereof, or the dead body or parts thereof. Title 16 United States Code, Section 1532(8).

4. The ESA makes it unlawful to knowingly deliver, receive, carry, transport, or ship in interstate or foreign commerce, by any means whatsoever and in the course of a commercial activity, any endangered species of fish and wildlife. Title 16, United States Code, Sections 1538(a)(1)(E) and 1540(b)(1).

5. Title 16, United States Code, Section 3372(a)(1), a provision in the Lacey Act, makes it unlawful for a person to transport or sell in interstate or foreign commerce any fish or wildlife that was sold or transported in violation of or in a manner unlawful under a law or regulation of the United States.

6. Tigers (*Panthera tigris*), are the largest cat species, most recognizable for their dark vertical stripes on the reddish-orange fur with a lighter underside. Tigers are a long-ranging species and can disperse over distances of up to 400 miles to reach tiger populations in other areas. Adult tigers lead largely solitary lives, establishing and maintaining home territories which they roam. Since the early 20th century, tiger populations have lost at least 93% of their historic range, being eliminated from Western and Central Asia, the islands of Java and Bali, and large areas of Southeast Asia and China. Today's tiger range is fragmented, stretching from Siberia to India and Sumatra. As of 2015, global wild tiger populations were estimated to be between approximately 3,000-4,000 mature individuals, with most remaining in small pockets isolated from each other. Declines in tiger populations are mostly associated with increased human activity such as habitat destruction, habitat fragmentation, and poaching for fur and body parts. Tigers have been listed as "endangered" on the ESA since its inception in 1973.

7. On or about June 1, 2019, in the Eastern District of Pennsylvania and elsewhere, the defendant

LOREN VARGA

knowingly received, carried, and transported an endangered species of wildlife, specifically parts of a tiger in the form of a rug, with a market value greater than \$350, in interstate commerce and in the course of a commercial activity.

In violation of Title 16, United States Code, Sections 1538(a)(1)(E) and 1540(b)(1).

COUNT TWO

(Lacey Act Violation)

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

1. Paragraphs one through six of Count One are incorporated here.
2. On or about June 1, 2019, in the Eastern District of Pennsylvania and elsewhere, defendant

LOREN VARGA

knowingly engaged in the receipt, acquisition, and purchase of wildlife with a market value in excess of \$350, that is, a tiger rug the defendant received, acquired, and purchased for \$6,800, knowing that the wildlife was taken, possessed, sold, and transported in violation of, and in a manner unlawful under, federal law, specifically, Title 16, United States Code, Section 1538(a)(1).

All in violation of Title 16, United States Code, Sections 3372(a)(1) and 3373(a)(1)(B).


for WILLIAM M. MCSWAIN
UNITED STATES ATTORNEY